

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**MOTION OF THE UNITED STATES POSTAL SERVICE FOR LATE ACCEPTANCE
OF WITNESS ELMORE-YALCH'S RESPONSES TO APWU INTERROGATORIES
APWU-T11-1-16**

The United States Postal Service hereby moves for late acceptance of the response of witness Elmore-Yalch to American Postal Workers Union, AFL-CIO, filed January 10, 2012. The responses are accordingly one day late. The delay was caused by the press of related work and the need for cross-functional coordination to complete these responses. The Postal Service regrets the delay, but believes that any prejudice is minimal.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno, Jr.
Chief Counsel, Global Business & Service
Development

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083; Fax -3084
January 25, 2012